BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

RECEIVED
APR 18 4 06 PM 'N1

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF FILING OF RESPONSE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE (April 18, 2001)

The United States Postal Service hereby moves that it be permitted to file two calendar days late the response of witness Kalenka to the following interrogatory of the Office of the Consumer Advocate filed on April 5, 2001: OCA/USPS-T3-1.

The response was due to have been filed on April 16, 2001. Before consultations regarding the response could be concluded on the 16th, undersigned counsel had to leave the office to catch a train to attend a funeral out of the city the following day, yesterday. Neither counsel nor the witness were in their respective offices yesterday. They were not able to complete consultations until today. Accordingly, the response is being submitted today, two days late. The Postal Service considers that no party has been prejudiced by this slight delay and moves that its filing be accepted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 Tel: (202) 268-2998; Fax: -5402

April 18, 2001